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February 7, 2020

By ECF

Hon. Peggy Kuo United States District Court 225 Cadman Plaza East Brooklyn, NY 11201

Re:

Dawson v. Merck, No.: 1:12-cv-01876 (BMC)(PK)

Dear Magistrate Judge Kuo:

We represent Reuters America LLC ("Reuters") in the above-referenced action and we write on behalf of all parties to the unsealing application to request an adjournment of the March 17 oral argument scheduled in this matter to March 26, 2020.

This morning, I reached out to counsel for Plaintiff Paul Dawson and for the Merck parties to ask if they would agree to our request to adjourn the hearing until 2:00 pm on March 17, 2020 because we have a conflicting hearing. Mr. Laszlo, counsel for Mr. Dawson, informed me that he was not available at all on March 17 because he is attending an arbitration in Utah. Thereafter, the parties agreed that we were all available on March 26, 2020. The parties, therefore, jointly request that the hearing be adjourned to that date.

In addition, Mr. Laszlo asked to appear telephonically. The parties consent to his appearing telephonically, and I told Mr. Laszlo I would incorporate his request into this letter.

Thank you for your consideration.

Respectfully Submitted,

Davis Wright Tremaine LLP

Katherine M. Bolger

Lother M.BC